

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALPHONSE TRUCCHIO, et. al.,

Defendants.

S1 11 CR. 614 (VM)

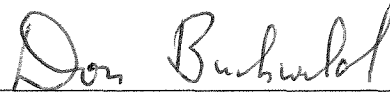
**NOTICE OF MOTIONS**

PLEASE TAKE NOTICE that, upon the annexed declarations of Defendant Natalia Ivanova (“Ivanova”) and Don Buchwald, and the accompanying Memorandum of Law, Defendant Ivanova will move this Court before the Honorable Victor Marrero at the United States Courthouse, Courtroom 11B, 500 Pearl Street, New York, New York, at such time as the Court may set, for Orders:

1. Suppressing, as violative of Ivanova’s Fourth, Fifth and Sixth Amendment rights under the United States Constitution, all post-arrest statements made by her and evidence seized from her and her apartment on the day of her arrest;
2. Compelling the government, under the reasoning of *United States v. Bortnovsky*, 820 F.2d 572 (2d Cir. 1987), to produce a bill of particulars detailing a complete list of all of the fraudulent marriages that Ivanova is alleged to have participated in;
3. Requiring the turnover to the defense of copies of relevant “A” files; and
4. Granting such further relief as the Court deems just and proper under these circumstances.

Dated: New York, New York  
August 16, 2013

Respectfully submitted,

A handwritten signature in cursive script, reading "Don Buchwald".

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